

Cultural Resources

Archaeology Documentation

Determining Required Documentation
Consultation with Project Historian
No Potential To Cause Effect Documentation
Archaeological Short Report
Phase I Archaeological Survey Documentation
Technical Reports Documentation
Cemetery Documentation and Permitting
Phase II Archaeological Testing Documentation
Phase III Archaeological Data Recovery Documentation
Documentation of Project Changes
Quality Assurance/Quality Control Expectations
Digital Data Packages
Document and Data Submittals
Environmentally Sensitive Area Transmittals

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings (see Consultation Initiation Guidebook). The goal of the archaeology documentation is to thoroughly record the results of the fieldwork conducted for Georgia Department of Transportation (GDOT) projects (see Archaeology Survey Guidebook) as part of the Section 106 or GEPA process.

The archaeologist is encouraged to familiarize themselves with the following documents and ensure all documentation is prepared in accordance with the following:

- > Programmatic Agreement (PA) among the Federal Highway Administration (FHWA), the United States Army Corps of Engineers (USACE), the Georgia State Historic Preservation Officer (SHPO), the ACHP, participating federally recognized tribes, and GDOT Regarding the Section 106 Process for the Transportation Program in Georgia
- > GDOT Section 106 Cultural Resources Manual
- > Programmatic Agreement among the FHWA, GDOT, and SHPO Regarding Historic Streetcar Archaeological Sites in Georgia
- > Memorandum of Understanding (MOU) among FHWA, GDOT, and SHPO Regarding Definition of the Section 106 Area of Potential Effect for Historic and Archaeological Resources for GDOT Traffic Operations Projects: Improvements to Existing Signalized Intersections
- > GDOT Archaeological Survey and Testing Report Guidelines
- > GDOT Archaeological Short Report (ASR) Instructions and Template
- > *Georgia Standards and Guidelines for Archaeological Investigations* from the Georgia Council of Professional Archaeologists (GCPA)
- > *Archaeological Assessment Report Guidelines and Components* from the Georgia SHPO

- > Secretary of the Interior's (SOI) Historic Preservation Professional Qualification Standards
- > Society for American Archaeology (SAA) Style Guide (revised July 2021)

DETERMINING REQUIRED DOCUMENTATION

The following table provides a brief description of the type of archaeological documents necessary to complete the Section 106 or GEPA process, when they are applicable based on results, and the coordination required. To avoid delays in project delivery, if survey is anticipated the consultant should scope for a full Phase I Archaeological Survey Report during contract scoping and negotiations

Table 1 – Types of GDOT Archaeological Documents.

Type	Associated Documents	General Applicability
No Potential To Cause Effect (NPTCE)	<ul style="list-style-type: none"> • NPTCE Memo • Email Response • No Historic Properties Affected (NHPA) 	Certain GDOT maintenance activities and minor highway projects may constitute an undertaking, but do not have the potential to cause effect to Historic Properties including ineligible or eligible for the National Register of Historic Places (NRHP). Projects of this type will be reviewed for applicability under Section 5.2 of the GDOT Cultural Resources Manual by GDOT's Historians and Archaeologists and will be documented in a memo, email write-off, or as part of a No Historic Properties Affected document, depending on the project activity. Additionally, these projects are tracked in a database for annual reporting required by the Section 106 PA.
Archaeological Short Report (ASR)	<ul style="list-style-type: none"> • ASR 	This abbreviated report format is approved for use on Phase I archaeological surveys that result in negative findings or have identified any of the following within the survey area: isolated finds, possible historic streetcar resources, cemeteries within the viewshed (i.e., outside the survey area), and modern cemeteries requiring archaeological delineation. Additionally, the ASR can be used to document projects with overlapping coverage from previous surveys utilizing current accepted standards, including those containing previously documented sites. For a full list of ASR applicability, refer to the GDOT ASR Template on the GDOT Cultural Resources Sharepoint Template Library.
Phase I Archaeological Survey	<ul style="list-style-type: none"> • Management Summary • Draft Report • Final Report 	If there is an archaeological site present within the survey area, either previously recorded or newly identified, a full Phase I Archaeological Survey Report is required. A Management Summary of preliminary findings is required for GDOT review in advance of the full report.
Phase II Archaeological Testing	<ul style="list-style-type: none"> • Testing Plan • Management Summary • Draft Report • Final Report 	If there is a site that has been recommended for additional Phase II testing (whether unknown or eligible) within the survey area which cannot be avoided, a Phase II Testing Plan and a Phase II Testing Report will be required, including a Management Summary. Please note that, depending on project needs and in consultation with the GDOT Archaeologist, a combined Phase I/Phase II report may be undertaken.
Phase III Data Recovery	<ul style="list-style-type: none"> • Data Recovery Plan • Management Summary • Draft Report • Final Report 	If an eligible site within the survey area cannot be avoided and the proposed project will have an adverse effect to the site (see Assessment of Effects Guidebook), a Data Recovery Plan and a Data Recovery Report will be required, including a Management Summary.
Project Changes	<ul style="list-style-type: none"> • Addendum Report • Re-evaluation Memo 	<p>If there are project design changes (i.e., as a result of Preliminary Field Plan Review [PFPR], and/or Final Field Plan Review [FFPR]) that occur outside of the previously surveyed area (for the current project), additional fieldwork may be required. Depending on the results of this fieldwork, the addendum survey may be reported in an addendum ASR or an addendum Phase I Archaeological Survey Report, which includes a Management Summary.</p> <p>If the project design changes occur within a previously surveyed area (for the current project), then these changes should be documented in a Re-evaluation Memo (refer to Stipulation VII.E of the 2019 PA, and the template on the GDOT Cultural Resources Sharepoint Template Library).</p>

CONSULTATION WITH PROJECT HISTORIAN

The archaeologist should coordinate with the project historian on all shared resources within the survey area (i.e., battlefields, cemeteries, mills, Trail of Tears, Old Federal Road, etc.) in order to thoroughly document and evaluate the resource. This may also include archaeological sites within historic districts or larger historic properties, such as farmsteads.

Every effort should be made to ensure collaboration with the project historian when a historic period archaeological site or a cemetery is identified during survey as early in the project as possible. Collaboration between the project archaeologist and the project historian is essential during the Phase I survey as historic archaeological sites may be related to a historic structure, building, object, or district. Similarly, if a historic cemetery is located during survey, regardless of whether the cemetery lies within the survey area or in the viewshed, consultation between historian and archaeologist should be initiated to discuss initial findings, research, boundaries, and how to proceed regarding resource management and National Register of Historic Places (NRHP) recommendations. The relationship between the related resources should be documented in the archaeological report, however a full reiteration of the history evaluation does not need to be included. A brief summary and citation will suffice.

NO POTENTIAL TO CAUSE EFFECT DOCUMENTATION

Certain GDOT maintenance activities and minor highway projects may constitute an undertaking, as defined in 36 CFR 800.16(y), but do not have the potential to cause effect to Historic Properties including ineligible or eligible for the NRHP as agreed upon by the signatory parties of the 2019 PA and enumerated in Section 5.2 of the GDOT Cultural Resources Manual. No Potential To Cause Effect (NPTCE) projects can be documented in several ways, depending on the situation. NPTCE projects of this type will be reviewed for applicability by GDOT's SOI qualified archaeologists and historians and will be documented with a memo (for consultant projects) or email write-off/memo (for in house projects), as well as through tracking of a list of projects reported annually to the parties of the 2019 PA per Stipulation XI of the PA. Reference materials including visual glossaries, are available on the GDOT Cultural Resources website. All documents should be submitted for review following procedures laid out in Table 3 (below).

A NPTCE Memo is prepared when all project activities are considered not to have potential to affect archaeological resources. This standalone memo is used when documentation is not combined with historic resources requiring input from the project historian (such as in an NHPA) and the project is not covered under the internal GDOT Office of Environmental Service (OES) NPTCE Email Response. In addition, a NPTCE Memo may be prepared for Signal Upgrade projects that fall completely under the parameters of a NPTCE for archaeological resources per the 2018 MOU *Regarding Definition of the Section 106 Area of Potential Effect for Historic and Archaeological Resources for GDOT Traffic Operations Projects: Improvements to Existing Signalized Intersections*.

A NHPA document is prepared jointly and in coordination with the project historian. The NHPA document is used when all project activities are NPTCE to archaeological resources (i.e., curb cuts or certain signal upgrades), and the project historian needs to prepare an NHPA for their historic survey. The cover page of the document will indicate that it is a joint document that contains both Archaeology and History (see Template in the GDOT Cultural Resources Sharepoint Template

Library). If a full Historic Resources Survey Report (HRSR) is required, the archaeological resources NPTCE is to be documented in the standalone NPTCE Memo.

An NPTCE Email Response is restricted to use for internal GDOT reviews and is not considered a consultant deliverable. Certain maintenance projects that are found to be NPTCE for both archaeology and history are cleared using an NPTCE Email response provided to the specialists by the Environmental Analysts using an email template. The email response includes a section for Cultural Resources that references the 2019 PA and Cultural Resources Manual and details the applicable category of NPTCE for the proposed activities.

ARCHAEOLOGICAL SHORT REPORT

This abbreviated report format is approved for use on Phase I archaeological surveys that result in negative findings or have identified any of the following within the survey area: isolated finds, possible historic streetcar resources, cemeteries within the viewshed (i.e., outside the survey area), modern cemeteries requiring archaeological delineation, or projects utilizing areas of prior survey coverage, with or without sites. A GDOT Archaeological Short Report (ASR) will be completed in PDF format using the approved ASR template according to the specified instructions (see GDOT Archaeological Short Form Instructions and Template). An ASR should be submitted for review following procedures laid out in Table 3.

If a modern cemetery is the only identified resource within the survey area, it can be included in an ASR. The methods of cemetery delineation and results should be described, but a site form and NRHP evaluation are not required.

In consultation with the GDOT Archaeologist, the archaeologist may request to utilize existing coverage from a previous archaeological survey in lieu of new survey. However, for a previous archaeological survey to be considered adequate survey coverage, it must be demonstrated to have used methods that compare to the current requirements of the Archaeology Survey Guidebook and current statewide archaeological standards. The current condition of the project area will need to be documented for the current survey. This coordination effort with the GDOT Archaeologist must take place prior to conducting fieldwork.

In instances where previously recorded archaeological resources are in the overlap areas between the current project and the previous survey coverage, the ASR should provide a detailed description of the previous survey findings and provide an assessment of the current site conditions for the current project. A copy of the SHPO concurrence letter for the project used for previous survey coverage is to be included as an attachment to the ASR, when available. When previous coverage includes an eligible or unknown sites where further Phase II testing is recommended, or sites that contribute to the eligibility of a larger historic property or district, a full report will be required in lieu of an ASR.

*Please note that Georgia Archaeological Site File (GASF) and Georgia's Natural, Archaeological, and Historic Geographic Information System (GNAHRGIS) searches are only considered valid for one-year post search date; if reporting occurs later than one year after the background review, a new/updated search should be undertaken.

PHASE I ARCHAEOLOGICAL SURVEY DOCUMENTATION

A Phase I archaeological survey report can include the reporting of a new project survey or an addendum survey. Reports should include all appropriate information per the GDOT Archaeological Survey and Testing Report Guidelines. Each Phase I Archaeological Survey Report requires the advanced submission of a Management Summary for review by the GDOT Archaeologist. The Phase I documentation should be submitted for review following procedures laid out in Table 3.

Management Summary

A Management Summary shall be submitted to the GDOT Archaeologist within two weeks of completing the fieldwork if sites are recorded or revisited. In consultation with the GDOT Archaeologist, the Principal Investigator may request additional time for submission of this document if the project schedule allows.

The Management Summary for Phase I survey will include enough information for the GDOT Archaeologist to assess the survey coverage, preliminary results, recommendations for NRHP eligibility, and any recommendations for additional work such as Phase II testing. The information should be presented succinctly and include, at a minimum: project description, description of the survey area, table and figure of previously recorded sites within 1-km and intersecting surveys, brief survey methods, survey results with shovel test data plotted on project maps, site descriptions and locations, site delineation maps, artifact counts and provenience, preliminary NRHP eligibility recommendations, and recommendations for additional work such as Phase II testing. Additionally, draft Georgia Archaeological Site Forms and a curation statement should be provided with the Management Summary. For projects with site revisits, copies of the original site forms should also be included.

All newly recorded and revisited sites should be documented with a draft site form. Site forms for revisited sites should document the most recent investigation and update site information as necessary (i.e., NRHP eligibility recommendations, site boundaries, UTM corrections, preservation state, cultural affinity, etc.). For instance, if a site is revisited that was previously recommended ineligible for the NRHP, the findings and recommendation of the current survey should present the results of the revisit in terms of whether the data in the survey area contains data potential and whether that finding supports the previous recommendation.

The curation statement should include the following information: firm and Principal Investigator identification; summary of scope of work (approximate level of investigation); makeup of collection (approximate volume and type of material); curation issues/concerns; and approximate date of anticipated collection submittal to Antonio J. Waring Jr. Laboratory at the University of West Georgia, or other repository as appropriate. It is also recommended that the consultant notify the repository after fieldwork completion if potential curation problems are identified.

After GDOT review and approval of the Management Summary, the consultant will submit Georgia Archaeological Site Forms to the GASF for official site number designations and will incorporate these numbers into the Phase I Archaeological Survey Report. Management Summary comments provided by GDOT should be addressed in the preparation of the Phase I Archaeological Survey Report; however, if additional fieldwork or boundary revisions are needed, a revised Management

Summary may be required upon fieldwork completion and prior to submittal of the Phase I Archaeological Survey Report.

Draft Phase I Archaeological Survey Report

A draft Phase I Archaeological Survey Report will be prepared in accordance with the GDOT Archaeological Survey and Testing Report Guidelines as well as in accordance with standards acceptable to appropriate state and federal review agencies, as determined by GDOT. The draft report will be prepared for review by GDOT within one month after receipt of the Management Summary comments from the GDOT Archaeologist, or in accordance with the project schedule or other agreed upon timeframe in consultation with the GDOT Archaeologist. All comments on the Management Summary should be addressed in the draft submittal of the Phase I Archaeological Survey Report. Prior to submittal, the draft report should have undergone rigorous Quality Assurance/Quality Control review.

If applicable, appendices should include at a minimum the following: Georgia Archaeological Site Forms, Artifact Catalog, curriculum vitae (CV) of the Principal Investigator (not to exceed two pages), and any applicable permits e.g., Archaeological Resource Protection Act (ARPA) permit. Appendices may also include scope of work, specialist analyses/reports, correspondence from interested/consulting parties, etc.

*Please note that GASF and GNAHRGIS searches are only considered valid for one-year post search date; if reporting occurs later than one year after the background review, a new/updated search should be undertaken.

Final Phase I Archaeological Survey Report

Upon review of federal agencies (e.g., SHPO, FHWA, ACHP, etc.), federally recognized tribes, and consulting parties, any comments received will be incorporated into the Final Phase I Archaeological Survey Report prior to distribution.

TECHNICAL REPORTS DOCUMENTATION

If specialized investigations are required for any archaeological document (i.e., underwater surveys, geophysical surveys, geomorphology investigations, etc.), the results should be incorporated into the appropriate archaeological document, with a corresponding technical report attached as an appendix. A separate standalone report for any specialized investigation may be required on a project-specific basis and submitted in the same manner as the full Phase I Archaeological Survey Report. Technical reports should include at a minimum: a project description, the applicability of the specialized investigation to the survey area and/or site, methodology, results including detailed maps and graphics to aid in interpretation of the results, NRHP recommendations, and resource management considerations. If the results of specialized investigations are negative, the technical report may be appended to an ASR.

Underwater Survey Documentation

When appropriate, the underwater survey and results should be incorporated into the Phase I Archaeological Survey Report. However, a stand-alone underwater report may be required based on the timing of the survey and scheduling should be determined in coordination with the GDOT Archaeologist.

If a stand-alone underwater report is required, it should include the following:

- > A current review of records for reported shipwreck locations in addition to a GNAHRGIS search for previously recorded sites and surveys. If there is a potential for precontact sites within the survey area, this should also be discussed.
- > Review of literature, both primary and secondary resources, to describe the area's maritime context and maritime landscape.
- > Discussion of Survey Methods including post-processing software and techniques, technical specifications of geophysical equipment used, ground-truthing methods, line spacing, weather conditions, target prioritization, etc.
- > Interpretations of anomalies, NRHP evaluations of identified sites, and management recommendations.
- > A Survey Results Map shall be provided that includes the survey boundary, survey lines and direction, and locations of sonar contacts, magnetic anomalies, and site boundaries. If side-scan-sonar or magnetometer were used, a magnetic contour map and side-scan sonar mosaic shall be provided. If Sub-bottom profiler was used during the survey, potential precontact sites shall be delineated and shown on the Survey Results Maps. If no anomalies were identified, provide a representative data sample.
- > Plan view maps of any identified sites shall be included.
- > A table of all sonar contacts shall be provided. Information shall include, picture of the sonar contact with the contact number, depth, dimensions (Length x Width x Height), shape, and any association with magnetometer anomalies, line numbers, and coordinates.
- > A table of all magnetometer anomalies shall be provided. Information shall include depth, magnetic signature, intensity, duration, interpretation, and coordinates.

Technical reports should be submitted for review following procedures laid out in Table 3.

CEMETERY DOCUMENTATION AND PERMITTING

This section details the various documentation and permitting needs and requirements for cemeteries located within a proposed GDOT project and for those cemeteries located within the viewshed of a proposed GDOT project. Coordination with the project historian is necessary for all cemeteries to ensure proper documentation and resource boundaries with both Historic and Archaeological documents.

For all GDOT projects, any cemeteries identified within the survey area for a given project should be archaeologically delineated, regardless of age, to ensure compliance with Georgia's Abandoned Cemeteries and Burial Grounds Act (OCGA 36-72).

All cemeteries, regardless of age, should be noted on the archaeological resources location map that is part of the documentation requirements for an ASR or a Phase I Archaeological Survey Report, including results of deed research and any archaeological investigations. For historic cemeteries, the results of deed research and any cemetery boundary coordination should be included within the associated project report by both archaeologists and historians, and reports cross referenced for consistency.

Consultants should refer to the GDOT Cultural Resources Cemetery Procedures for guidance on cemetery identification and consultation with the project historian, as well as documentation and NRHP evaluation procedures.

Cemeteries in the Viewshed

Cemeteries that do not fall within the survey area boundary are considered viewshed cemeteries (i.e., they can be seen from the survey area). Depending on the proximity of the cemetery to the survey area boundary, investigations may be necessary to ensure that no burials lie within the survey area. If associated burials are detected within the survey area, the cemetery is no longer considered a viewshed cemetery and the Project Archaeologist should follow procedures set forth in the GDOT Cultural Resources Cemetery Procedures. Coordination with the project historian is necessary to establish if the resource is being evaluated for the project's HRSR and to determine if they have established a boundary for the resource. If a cemetery recorded by the project historian does not lie within the survey boundary, it is not evaluated for Criterion D of the NRHP by the archaeologist, but rather the cemetery is documented with a GASF Site Form with any applicable HRSR evaluations noted. The cemetery GASF Site Form is to be included with all survey documentation for the project (e.g., ASR, Phase I Archaeological Survey Report, etc.).

Modern Cemeteries

Modern cemeteries are defined as those that do not contain any burials older than 50 years of age. While the project historian will not record a modern cemetery in their documentation, the project archaeologist should consult and collaborate with the project historian in order to ensure consistency in documentation and resource boundaries.

Because they do not meet the definition of an archaeological site as defined by the GCPA, modern cemeteries are not recorded as archaeological sites, nor are they evaluated for the NRHP. However, archaeological delineation of modern cemeteries within the survey area is required to ensure compliance with Georgia's Abandoned Cemeteries and Burial grounds Act (OCGA 36-72) and require documentation in the appropriate report format.

If a modern cemetery is the only resource identified within the survey area, an ASR can be used to document the delineation efforts for the cemetery. If a modern cemetery is identified along with other archaeological sites on a project, delineation of the cemetery should be included in the Management Summary and full Phase I Archaeological Survey Report.

Permits under Georgia's Abandoned Cemeteries and Burial Grounds Act, OCGA 36-72

If a proposed project is unable to avoid impacts to burials, regardless of age, and the county in which it is located has adopted the provisions of OCGA 36-72, as amended, GDOT is required to obtain a permit from the County Superior Court. If a proposed project requires right-of-way (ROW) or easement from within a cemetery boundary, but no graves would be impacted, GDOT is exempt from cemetery permit requirements pursuant to OCGA 36-72-14(c). If the proposed project would result in the relocation of graves, then compliance with OCGA 36-72 must be undertaken and a permit pursuant to OCGA 36-72-4 must be acquired by GDOT. This exemption is specific to GDOT Let projects and any projects sponsored by local governments may require a permit if a cemetery property is impacted even if no burials are impacted. In these instances, coordination may be needed to determine if the county in which it is located has adopted the provisions of OCGA 36-72.

In the event that a cemetery permit is required, the archaeologist will need to comply with OCGA 36-72-5(2), which states that an archaeological report must be written detailing the investigation of the cemetery. The report shall detail the number of graves believed to be present, include a map of the cemetery including grave location and cemetery boundary, and a description of methods used to investigate the cemetery or burial ground.

The following procedures will be completed by the archaeologist (in consultation with the GDOT Archaeologist) in order to obtain the necessary items for the permit application as specified in OCGA 36-72-5.

1. *Background research*

An extensive background literature review will be conducted to develop the historic context for said cemetery and will include a review of pertinent documents housed at the Map Library and the Georgia Room at the University of Georgia, Athens (UGA), the Georgia Archives, the Georgia Historical Society, etc.; and examination of county-level record sources to include local libraries and the courthouse. Census and other genealogical records will be examined, and informant interviews will be conducted, as required, to yield information on descendants.

2. *Preparation of permit package (OCGA 36-72-5)*

The archaeologist will be responsible for completing/obtaining the following items (in consultation with GDOT):

- a. Title search to establish ownership and yield title opinion for parcel of land on which cemetery is located. If no legal deed exists defining the boundary of the cemetery, then it is the responsibility of the archaeologist to delineate an appropriate legal boundary that encompasses all associated cemetery features.
- b. Archaeological delineation of the cemetery boundary to include the number and location of burials therein.
- c. Survey by registered surveyor showing location and boundary of cemetery based on the archaeological delineation. The location and boundary of the cemetery will be transferred to proposed project construction sheets for use in the permit application.
- d. Plan for identification and notification of descendants of those buried in cemetery.
- e. Plan for mitigation of cemetery if applicable to the removal and relocation of burials, or, if not applicable, demonstrated efforts incorporated into the proposed project design that reflect minimization of harm relating to land use conversion from the cemetery parcel.

3. *Permit package submittal*

The completed permit package, above items 2a-e, shall be submitted to GDOT. The archaeologist (consultant or GDOT, as appropriate) will be required to attend the Superior Court hearing as a witness when the court date is scheduled.

PHASE II ARCHAEOLOGICAL TESTING DOCUMENTATION

Depending on project needs and in consultation with the GDOT Archaeologist, information reported in a Phase II Archaeological Testing Report may be included with the Phase I Archaeological Survey Report, creating a combined Phase I/Phase II report.

A Phase II Testing Plan is prepared by the project archaeologist for approval by GDOT and SHPO, participating federally recognized tribes, and consulting parties. Once approval of the Phase II Testing Plan is acquired from all parties, Phase II testing fieldwork can commence. Following the completion of fieldwork, a Management Summary and a Phase II Archaeological Testing Report are prepared by the project archaeologist. The Phase II documentation should be submitted for review following procedures laid out in Table 3.

Phase II Testing Plan

In consultation with the GDOT Archaeologist, a Phase II Testing Plan is to be developed for any sites recommended for Phase II testing investigations. A Testing Plan should include site background information (i.e., previous Phase I archaeological work and recommendations), proposed research questions, proposed fieldwork, recommended sequencing, and analytical methods in order to answer the research questions, including any proposed remote sensing, laboratory methods including curation processes, and a site-specific plan for the treatment of human remains. The testing plan should also include appropriate maps and figures to illustrate the Phase I survey results and proposed Phase II fieldwork, as well as a copy of site forms. For site revisits, copies of the original site forms should also be included. If available, the testing plan should include current project plans showing anticipated areas of impact to assist in focusing the testing.

Management Summary

A Management Summary and curation attachment should also be submitted after completing Phase II fieldwork. The content of the Phase II Management Summary and the schedule for submittal should be coordinated with the GDOT Archaeologist. The Management Summary for Phase II testing will include enough information for the GDOT Archaeologist to assess the Phase II fieldwork, preliminary results, and subsequent NRHP recommendations. The information should be presented succinctly and include, at a minimum: summarized descriptions of the size, extent, and results of the excavations outlined in the Phase II Testing Plan, including any deviations from the plan that occurred in coordination with the GDOT Archaeologist. It should include a discussion of the nature and number of features identified and excavated, the nature of the artifacts and other data recovered, in both qualitative and general quantitative terms. The Management Summary shall also include tabular data, graphics, maps, photographs, and other data as appropriate to illustrate the extent of field excavations and to support a NRHP recommendation for the site. For all sites undergoing Phase II testing, an updated draft site form should be included with the Management Summary.

Draft Phase II Archaeological Testing Report

A draft Phase II Archaeological Testing Report will be prepared using reporting procedures outlined in the GDOT Archaeological Survey and Testing Report Guidelines as well as in accordance with standards acceptable to appropriate state and federal review agencies, as determined by GDOT. The draft Phase II Archaeological Testing Report will be prepared for review by GDOT within one month after receipt of the Management Summary comments from the GDOT Archaeologist, or in accordance with the project schedule or other agreed upon timeframe in consultation with the GDOT Archaeologist. All comments on the Management Summary should be addressed in the draft submittal of the Phase II Archaeological Testing Report.

The draft Phase II Archaeological Testing Report should include detailed information on excavation units including plans and profiles, feature excavations with plans and profiles, information from special analysis (e.g., radiocarbon dating, faunal analysis, remote sensing, etc.), detailed artifact analysis including photographs and tables, an analysis of horizontal and vertical artifact distributions, NRHP eligibility recommendations, and resource management considerations.

The draft Phase II Archaeological Testing Report should identify significant features and cultural deposits in relation to the site's data potential, as well as provide an argument on the site's integrity for use in avoidance and minimization discussions and assessment of the project's impacts to the NRHP-eligible site.

If applicable, the report should include data recovery/research design strategies and research questions that could be addressed through mitigation, if avoidance of adverse effect is not possible.

Final Phase II Archaeological Testing Report

Upon review of agencies (e.g., SHPO, FHWA, ACHP, etc.), federally recognized tribes, and consulting parties, any comments received will be incorporated into the Final Phase II Archaeological Testing Report prior to distribution.

PHASE III ARCHAEOLOGICAL DATA RECOVERY DOCUMENTATION

After the consideration of avoidance alternatives and measures to minimize harm (pursuant to the Assessment of Effects Guidebook), and the NRHP Criteria of Adverse Effect have been applied, archaeological data recovery may be required to mitigate an adverse effect associated with a proposed undertaking.

A Phase III Data Recovery Plan is prepared by the project archaeologist for approval by GDOT and SHPO, participating federally recognized tribes, and consulting parties. Following the completion of fieldwork, a Management Summary and a Phase III Archaeological Data Recovery Report are prepared by the project archaeologist. The Phase III documentation should be submitted for review following procedures laid out in Table 3.

Phase III Data Recovery Plan

In consultation with the GDOT Archaeologist, a Phase III Data Recovery Plan is to be developed for any sites undergoing data recovery investigations to mitigate adverse impacts. The Phase III Data Recovery Plan will be submitted to state and federal agencies, federally recognized tribes, other consulting parties, as applicable, for review and comment prior to initiating any fieldwork. A Data Recovery Plan should include site background information, a research design, and the proposed methodology.

Background information included in the Data Recovery Plan should include the cultural setting of the site (i.e., a specific and detailed cultural context for the significant cultural components of the site), and a summary of all previous Phase I and Phase II investigations. The research design should broadly outline topics that may be addressed by the Phase III excavations (e.g., site organization and function, settlement patterns, etc.), followed by specific research questions that may be addressed by the Phase III excavations. The proposed data recovery methodology should be focused on obtaining relevant data needed to answer the proposed research questions. The

methodology should include details regarding additional background research, detailed maps of proposed locations of all fieldwork excavations, field methods (e.g. close interval shovel testing, block excavation, remote sensing, geomorphology, etc.), laboratory methods including analysis and curation (e.g. radio carbon dating, paleoethnobotanical analysis, specialized artifact analysis, etc.), public outreach efforts as related to the data recovery efforts, and a site-specific plan for the treatment of human remains. These methods should be developed in consultation with the GDOT Archaeologist. The proposed field methods.

Management Summary

A Management Summary and curation attachment should also be submitted after completing Phase III fieldwork. The content of the Phase III Management Summary and the schedule for submittal should be coordinated with the GDOT Archaeologist. The Management Summary should include an outline of the forthcoming Phase III Archaeological Data Recovery Report.

The Management Summary for Phase III data recovery will provide a preliminary summary of the results and be sufficient to allow the GDOT Archaeologist to assess whether the terms of the Data Recovery Plan have been met and assess the results of the preliminary findings. The information should be presented succinctly and include, at a minimum: summarized descriptions of the size, extent, and results of the excavations outlined in the Data Recovery Plan, including any deviations from the plan that occurred in coordination with the GDOT Archaeologist. It should include a discussion of the nature and number of features identified and excavated, the nature of the artifacts and other data recovered, in both qualitative and general quantitative terms. The Management Summary shall also include tabular data, graphics, maps, photographs, and other data as appropriate to illustrate the extent of field excavations. An updated draft site form should be included with the Management Summary. The Management Summary will also provide an outline of the forthcoming draft Data Recovery report and present additional analysis or research to be conducted and incorporated into the draft Data Recovery report.

Draft Phase III Archaeological Data Recovery Report

Due to the diverse nature of archaeological deposits and variety of archaeological site types, no standard data recovery reporting exists to address reporting requirements for all archaeological sites undergoing this type of investigation. The consultant and the GDOT Archaeologist should work together to establish expectations regarding the content of the Phase III Archaeological Data Recovery Report which are provided as an outline in the Management Summary.

Final Phase III Archaeological Data Recovery Report

Upon review of federal agencies (e.g., SHPO, FHWA, ACHP, etc.), federally recognized tribes, and consulting parties, any comments received will be incorporated into the Final Phase III Archaeological Data Recovery Report prior to distribution.

DOCUMENTATION OF PROJECT CHANGES

Often, project changes occur after archaeological surveys have been completed and the associated report(s) finalized (i.e., during preliminary design, as a result of Preliminary Field Plan Review [PFPR], Final Field Plan Review [FFPR], and Lockdown Plans). The Plan Development process (PDP) allows for changes to be made following initial survey for the project as a project develops and these changes are generally coordinated by the Environmental Analyst. Changes may be coordinated with Subject Matter Experts (SMEs) at varying times leading up to environmental authorizations for ROW and Let. Consultants should review the current project plans against the previous survey documentation, focusing on changes to the project footprint (APE) in relation to previous survey coverage and archaeological Environmentally Sensitive Areas (ESAs), to determine what kind of additional documentation is needed (i.e. memo, addendum report, addendum AOE, etc.). Overall, SMEs can document changes to the project plans at any time between completion of the original survey and environmental certification of the project for Let, as necessary by the project team.

Addendum

If there are project design changes that occur outside of the previously surveyed area for the current project, additional fieldwork may be required. Depending on the fieldwork results, the addendum survey may be reported in an ASR or a Phase I Archaeological Survey Report which includes a Management Summary. In some instances, an addendum reporting may include Phase II testing. Addendum reports shall follow the guidelines for addendum reports presented in GDOT's Archaeological Short Report Instructions or Archaeological Survey and Testing Report Guidelines, as applicable.

In consultation with the GDOT Archaeologist, the Environmental Overview and Background/Contextual Overview sections of the Addendum Phase I Archaeological Survey Report may be abbreviated or may be eliminated, if presented adequately in previous documents and if there have been no changes (i.e., no sites have since been recorded in the area) since submittal of previous reports for the project. All surveys conducted for the present project should be discussed in the addendum report to properly contextualize the addendum survey and results. Addendum reports should be submitted for review following procedures laid out in Table 3.

GASF and GNAHRGIS searches are only considered valid for one-year post search date; if reporting occurs later than one year after the background review, a new/updated search should be undertaken. If new sites have been identified within any portion of the project since the time of the original survey (by another unrelated survey or updated site file information), additional work at that location may be required and should be documented in the addendum.

Re-evaluation Memo

The PA (Stipulation VII.E) and the GDOT Cultural Resources Manual (Chapter 5.1) provide guidance when a Re-evaluation Memo is appropriate for a GDOT project that was previously cleared under Section 106 (see Table 1). If there are project design changes that occur within the previously surveyed area for the project, then these changes can be documented in a Re-evaluation Memo (see Template in the GDOT Cultural Resources Sharepoint Template Library). The Memo should include: the project description, description of all changes since the previous archaeological survey, summary of previous archaeological investigations, and a discussion of why no additional

archaeological survey is required. Archaeological re-evaluations will include a map demonstrating the limits of the current project footprint (APE) in relation to previous survey coverage for the project and any archaeological ESAs, as well as references for all previous surveys completed for the current project. For projects with eligible archaeological sites, Re-evaluation Memos should also address plan changes in relation to the original effects assessment. For changes that alter the affects finding to an eligible resource, an addendum Assessment of Effect will be required. The Re-evaluation Memo should be submitted for review following procedures laid out in Table 3.

QUALITY ASSURANCE / QUALITY CONTROL EXPECTATIONS

Prior to submittal of all archaeological documents to GDOT, the consultant shall review the document thoroughly for Quality Assurance / Quality Control (QA/QC). The purpose of the QA/QC review is to make a thorough evaluation of the quality of the content, format, and justification of the conclusions and recommendations provided in the document. The consultant should ensure the accuracy, clarity, and consistency of the information presented in the document. QA/QC reviews should be completed by an archaeological subject matter expert that is not the author of the document.

The QA/QC review should make sure that the document contains a solid contextual discussion of the environmental and cultural background, adequate methods for the undertaking, adequate survey coverage, detailed site descriptions and evaluations, site recommendations, management considerations, and consistency with current GDOT guidelines (see Table 2) Lastly, the consultant QA/QC process should review each document for spelling, grammatical, and formatting errors, including all appendices. Digital and hard copy documents should be cross checked for consistency and completeness.

Additionally, the consultant needs to ensure consistency within the document with regards to shared cultural resources (i.e., historic cemeteries, a historic site with standing structures, etc.) as well as consistency with the HRSR produced by the project historian. Coordination may require multiple touch points to ensure any revisions resulting from the review cycle that affect shared resources are captured in each discipline's documentation (i.e. changes in eligibility/boundary of a cemetery resulting from SHPO comments.)

The consultant QA/QC process is to be documented and submitted as a QA/QC review package along with all relevant document submittals (see Table 3). Revisions to documents per GDOT comments require an Errata response to the GDOT comments to be submitted along with a QA/QC review package of the revisions.

The consultant should be aware of common pitfalls in producing a document for GDOT review. The most common of these are provided in Table 2 below, and thus is not a comprehensive list of errors that can occur.

Table 2 – Common Pitfalls to Avoid When Producing a GDOT Document.

Common Pitfalls	
Content Issues	Report does not follow current GDOT Archaeology Survey and Testing Report Guidelines
	Errors resulting from copy/paste from other documents, neglecting to tailor to the project or resource
	Inaccurate or inconsistent Table of Contents, List of Figures/Tables, and References Cited
	Inaccuracies in the Project Description
	Inaccuracies in the descriptions of the survey area
	Lack of specific measurements for existing and proposed ROW
	Missing survey expectations and research questions developed from the environmental and cultural contexts
	Missing previously identified resources from the resource location map (i.e., Phase I survey results map)
	Incorrect/insufficient NRHP eligibility recommendations
	Missing Environmentally Sensitive Area (ESA) and orange barrier fencing (OBF) recommendations for all NRHP-eligible sites and unknown sites
	Missing summary of NRHP evaluations and recommendations at end of the document
	Missing previously identified site forms/SHPO documentation (if applicable) from the Appendix
	Appendices lack complete/updated information
	Inconsistent information provided throughout the report (i.e. NRHP evaluations, report details such as shovel test counts, etc.)
	Does not follow the appropriate style guide or is inconsistent throughout the report
Graphics Issues	Photographs and graphics appear dark/blurry/stretched when printed
	Resource boundary description does not match resource graphic and/or site form
	Incorrect styles used for site boundaries (i.e., unknown site boundary [dotted line], known site boundary [solid line])
	Scale(s) do not include useful, even increments
	Resources shown incorrectly and/or omitted from the resource location map (i.e., Phase I survey results map). Sites missing from all appropriate maps throughout report.
	Major and/or intersecting roadways are not labelled
	Missing shovel tests from the resource location map (i.e., Phase I survey results map)
	Map symbology is difficult to read to color, line weight, icon style/size in relation to background graphic
	Previously recorded site boundaries are mapped inaccurately, site locations/boundaries should be taken from the site forms
	Previously recorded site boundaries are not clearly shown in relation to results of current survey
	The survey area is inconsistently or inaccurately depicted
	The APE should be a polygon that incorporates all existing and required ROW and easements
	Addendum documents should depict the full extent of the project APE and distinguish areas covered under the addendum using previous survey coverage
	Map labels are inconsistent throughout the document (i.e. FS numbers in lieu of site numbers, etc.)

DIGITAL DATA PACKAGES

GDOT requires submittal of Digital Data Packages (DDPs) for each project in order to create a digital archive of archaeological surveys which can be accessed for future survey planning if project changes occur, or when a new project is located along previously surveyed corridors. It provides exact spatial information regarding archaeological surveys conducted for GDOT projects, thus taking the guesswork out of what has already been surveyed. In order to make the most out of this archive, the deliverable GIS shapefiles should be as uniform as possible not only on a per project basis, but also among all consultant deliverables. Additionally, a second package is required to facilitate transmittal of survey and site polygon data to the GASF for incorporation into GNAHRGIS. Please refer to the GDOT Archaeological Digital Data Package Guidance for additional information on requirements for the GDOT DDP and the GASF DDP.

Below are the minimum GIS submittal requirements for every GDOT project.

1. GDOT DDP: Includes shapefiles or geodatabases projected in NAD83 State Plane Georgia West or East US Foot, as this is the projection that facilitates seamless inclusion into GDOT Design plans and will be used for official project spatial data.
2. GASF DDP: Includes shapefiles projected in NAD27. This will be used for delivery to the GASF and prepared using a projected template developed by GDOT in coordination with GASF.

Consultants will provide all archaeological information in a GIS format compatible with ESRI's ArcGIS 9x or later software versions. This information will include polygon coverage (i.e. shape files) for all survey areas and archaeological site boundaries, as well as point data for all shovel tests and other features. This information will be provided digitally to GDOT after acceptance of the final report (see Table 3).

DOCUMENT AND DATA SUBMITTALS

The submittal and review process apply to all reports submitted for review to GDOT (e.g., ASR, Phase I Archaeological Survey Report, etc.). In order to obtain on-time quality documents GDOT OES has developed a procedure to provide a strategic approach for environmental documents requiring more than one review. The consultant is referred to the OES Consultant Document Review Process for standard review timelines. Specific details regarding the requirements for archaeological document submissions are summarized in Table 3 below.

Any changes made to a submitted document beyond those requested in the GDOT comments should be noted in the errata as well to assist in review of the applicable version; however, such changes should be limited to those critical to the content and coordinated with the GDOT Archaeologist beyond the errata.

Any submittal or schedule which may deviate from the standard OES Consultant Document Review Process should be coordinated with the GDOT Archaeologist with consideration given primarily to the project schedule's baseline dates.

Table 3 – Archaeology Document Submittal Requirements and Preferred Transmittal Methods.

Document Type	Version 1	Version 2 (and Subsequent Versions)	Distribution Copy	Final
No Potential to Cause Effect (Memo or NHPA)	<ul style="list-style-type: none"> Transmittal Letter Prime Verification Construction plans to verify activities for NPTCE <u>Document Format</u>: PDF <u>Transmittal</u>: Email or GDOT FTP Project Folder 	<ul style="list-style-type: none"> Transmittal Letter Errata QA/QC Packet <u>Document Format</u>: PDF <u>Transmittal</u>: Email or GDOT FTP Project Folder 	*Not required, GDOT Approved version is used for distribution and is considered final.	*Not required, GDOT Approved version is used for distribution and is considered final.
ASR	<ul style="list-style-type: none"> Transmittal Letter Prime Verification QA/QC Packet Copy of survey area provided for survey (ESB, concept layout showing survey area, construction plans, etc.) Landowner Notification Letter (copy of letter and list of recipients) ESC Waiver, as applicable <u>Document Format</u>: PDF <u>Transmittal</u>: Email or GDOT FTP Project Folder 	<ul style="list-style-type: none"> Transmittal Letter Errata QA/QC Packet <u>Document Format</u>: PDF <u>Transmittal</u>: Email or GDOT FTP Project Folder 	*Not required, GDOT Approved version is used for distribution.	<p><i>* Final copies of an ASR are required only when comments are received during consultation that necessitate revision.</i></p> <ul style="list-style-type: none"> Digital Data Packages (GDOT and GASF) <u>Document Format</u>: OCR enabled PDF, Hard copies, as requested <u>Transmittal</u>: GDOT FTP Project Folder
Management Summary	<ul style="list-style-type: none"> Transmittal Letter Prime Verification QA/QC Packet <u>Document Format</u>: PDF, Hard copy upon request <u>Transmittal</u>: Email or GDOT FTP Project Folder 	<ul style="list-style-type: none"> Transmittal Letter Errata QA/QC Packet <u>Document Format</u>: PDF <u>Transmittal</u>: Email or GDOT FTP Project Folder <p><i>*Revised version upon request only</i></p>	N/A	N/A
Archaeological Report (Phase I-III, Technical, or Addendum)	<ul style="list-style-type: none"> Transmittal Letter Prime Verification QA/QC Packet Copy of survey area provided for survey (ESB, concept layout, construction plans, etc.) Landowner Notification Letter (copy of letter and list of recipients) <u>Document Format</u>: PDF and Hard copy <u>Transmittal</u>: GDOT FTP Project Folder 	<ul style="list-style-type: none"> Transmittal Letter Errata QA/QC Packet <u>Document Format</u>: PDF, Hard copy upon request <u>Transmittal</u>: GDOT FTP Project Folder 	<ul style="list-style-type: none"> <u>Document Format</u>: PDF, Hard copy upon request <u>Transmittal</u>: GDOT FTP Project Folder 	<ul style="list-style-type: none"> Digital Data Packages (GDOT and GASF) <u>Document Format</u>: OCR enabled PDF, Hard copies, as requested <u>Transmittal</u>: GDOT FTP Project Folder
Testing/Data Recovery Plans	<ul style="list-style-type: none"> Transmittal Letter Prime Verification QA/QC Packet <u>Document Format</u>: PDF, Hard copies upon request <u>Transmittal</u>: Email or GDOT FTP Project Folder 	<ul style="list-style-type: none"> Transmittal Letter Errata QA/QC Packet <u>Document Format</u>: PDF <u>Transmittal</u>: GDOT FTP Project Folder 	<ul style="list-style-type: none"> <u>Document Format</u>: PDF, Hard copies on request <u>Transmittal</u>: GDOT FTP Project Folder 	<p><i>* Final testing/data recovery plans required only when comments are received during consultation that require revision</i></p> <ul style="list-style-type: none"> <u>Document Format</u>: PDF, Hard copies as requested <u>Transmittal</u>: GDOT FTP Project Folder
Re-Evaluation Memo	<ul style="list-style-type: none"> Transmittal Letter Prime Verification QA/QC Packet <u>Document Format</u>: PDF <u>Transmittal</u>: Email or GDOT FTP Project Folder 	<ul style="list-style-type: none"> Transmittal Letter Errata QA/QC Packet <u>Document Format</u>: PDF <u>Transmittal</u>: Email or GDOT FTP Project Folder 	N/A	

ENVIRONMENTALLY SENSITIVE AREA TRANSMITTALS

All archaeological sites with a NRHP recommendation of eligible or unknown need to be considered for designation as an Environmentally Sensitive Area (ESA). All cemeteries regardless of age or NRHP eligibility within the survey area should be designated as an ESA. An Isolated Find (IF) that cannot be fully delineated typically do not require an ESA designation. However, in an instance where an IF falls along the edge of a landform and/or has high potential for additional associated deposits outside of the survey area it requires an ESA designation, however this will be a rare occurrence. It should be noted that a site boundary and the corresponding ESA may not have an exact 1:1 relationship, as the ESA is designated to protect deposits which should not be impacted during the course of the undertaking. Therefore, an ESA may encompass potential unknown portions of a site that extend outside the survey area, or it may encompass deposits within the survey boundary for eligible sites or cemeteries.

The ESA boundary for each resource should be drawn based on all available evidence, such as geographic features or surface features, or lacking such evidence can be arbitrarily boxed. For a project in which there is an NRHP-eligible site within the survey area, or a site with an unknown NRHP eligibility that is recommended for additional Phase II testing, the ESA boundary should incorporate the known and unknown boundaries established during the Phase I archaeological survey. For sites within the survey area that have an unknown NRHP eligibility and which lack significant data potential in the survey area, the ESA boundary should be drawn to encompass the area beyond the limits of the survey area to incorporate the unknown boundary of the site as established during the Phase I archaeological survey. The ESA for unknown sites should generally be a minimum of 100 feet beyond the surveyed area, unless otherwise informed by the presence of a landform, parcel boundary, etc. that may potentially relate to the identified portions of the associated site.

All draft ESAs should be submitted to the GDOT Archaeologist for review and approval prior to submittal of the boundaries to the project design team. Review of the draft ESA boundary by the GDOT Archaeologist should occur after GDOT approval of the Management Summary and before the draft Phase I Report submittal for GDOT review and approval, unless otherwise coordinated with the GDOT Archaeologist. An ESA submittal package should be transmitted to the GDOT Archaeologist using the Draft ESA Submittal email template located in the GDOT Template library. The submittal email should include the following information for GDOT review:

1. Contact information for the Design Team
2. One .kmz file with the following layers: Limits of the Survey Area, limits of the existing ROW, Site Boundaries, and Proposed ESAs. Sites should be labeled by their site number and ESAs by their Resource number.
3. A table in the body of the email with a column for Resource Number, Site Number, County, Location (crossroad and distance or station number), and GDOT Comments.

Resource Number	Site Number	County	Location (Crossroad/Distance or Station Number)	GDOT Comments
-----------------	-------------	--------	---	---------------

4. Shapefiles of the proposed ESA boundary(ies). The shapefiles are to be projected in NAD83 State Plane Georgia West or East US Foot, as this is the projection that facilitates seamless inclusion into GDOT Design plans.

The GDOT Archaeologist will review the draft ESA boundary(ies) provided in the email and edits/comments will be made directly to the .kmz files and noted on the table. The GDOT Archaeologist will coordinate on any needed revisions with the consultant prior to transmission to the Design Team. Upon approval of the final ESA boundary(ies), the GDOT Archaeologist will transmit the approved ESA shapefiles to the Design Team using the Approved ESA Transmittal email template. The ESA boundaries are essential for the Avoidance and Minimization Measures Meeting (A3M) during which possible avoidance of, or minimizing impacts to, environmental resources will be discussed with the project team. All required archaeological ESAs shall be transmitted prior to the A3M meeting. The consultant is responsible for entering all archaeological ESAs into the A3M Tracking Spreadsheet prior to all A3M meetings (see information below and the Avoidance and Minimization Measures Meeting Guidebook).

Placement of orange barrier fencing (OBF) is used on project plans to designate a physical barrier between the work proposed and the ESA. The need for placement of OBF should be discussed at the A3M meeting and verified with receipt of preliminary plans for Technical Studies. It is not necessary to include the placement of OBF in the ESA transmittal. At the A3M, OBF should be designated for placement along the outside edge of the existing or required ROW or any easements for the length of the ESA being protected. The requirement of OBF is dependent on the proximity of the ESA to the proposed project's existing or required ROW and/or any easements (i.e., any ESA located far away from the existing or required ROW and/or any easements may not require OBF).

The final, approved ESA boundaries should also be included in the GDOT DDP that is submitted to GDOT once the Phase I Archaeological Survey Report has been concurred with by all consulting parties (see guidance above).

Avoidance and Minimization Measures Meeting

Once the ESAs have been approved by the GDOT Archaeologist and submitted to the project team, all the resources are to be added to the A3M Tracking Spreadsheet. The purpose of the A3M is to coordinate environmental concerns with project designers to devise a way to avoid resources, and if a resource cannot be avoided, to minimize the impact to the resource.

The GDOT A3M Checklist dated November 2017 and A Tool Kit for Cultural Resource A3M Preparation provides instructions and a checklist for consultants regarding the A3M Meeting. Following guidance provided by the A3M Checklist, once ESAs are added to the A3M Tracking Spreadsheet the consultant should email the GDOT Archaeologist (cc. the project NEPA Planner) that provides the GIS data for the ESAs as described above, and a link to the A3M Tracking Spreadsheet showing the ESAs have been added.

Five days prior to the A3M the consultant should receive project plans with the ESA boundaries depicted. The consultant is to review the plans for accuracy prior to the A3M and be prepared to discuss potential, acceptable design modifications to avoid and minimize ESA

impacts. The consultant should be fully familiar with, and prepared to discuss at the meeting, all the archaeological resources, their contributing features, and their associated ESAs as well as understand the implications for project impacts to resources (i.e., Assessment of Effects, agency coordination, etc.).

Guidebook Revision History

Revision Description	Relevant Sections	Revision Date
Initial Publication	All	11/1/2022